

1 Hon. Kymberly K. Evanson
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 ANGEL O. RIVERA-AREVALO, an
individual,

10 Plaintiff,

11 v.

12 ESURANCE INSURANCE COMPANY, a
foreign corporation, ESURANCE
13 INSURANCE SERVICES, INC., a foreign
corporation, and JOHN DOES I-IV,
14

15 Defendants.

16 NO. 2:23-cv-00978-KKE

**STIPULATION AND ORDER
EXTENDING EXPERT WITNESS
DISCLOSURE DEADLINES IN ORDER
SETTING TRIAL AND RELATED
DEADLINES**

17 **I. STIPULATION**

18 COME NOW the parties, by and through their undersigned counsel, and stipulate and
19 request pursuant to Fed. R. Civ. P. 29(b) and LCR 7(d)(1) that the expert witness disclosure
20 deadlines in the Court's Order Setting Trial and Related Deadlines, *see* Dkt. 8, be adjusted in the
21 following manner:

| Event | Current Deadline | Requested Deadline |
|--|------------------|--------------------|
| Disclosure of expert testimony under FRCP 26(a)(2) | April 10, 2024 | May 10, 2024 |

23 STIPULATION AND ORDER - 1

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| | | |
|--|--------------|--------------|
| 1 Disclosure of rebuttal expert testimony under FRCP 26(a)(2) | May 10, 2024 | May 31, 2024 |
|--|--------------|--------------|

3 Good cause exists for this request, as required in the Order Setting Trial and Related
 4 Deadlines.¹ First, the parties have been working diligently to complete discovery. The current
 5 expert witness disclosure deadline of April 10, 2024, is nearly six months prior to the current
 6 trial date of October 7, 2024, and two months prior to the discovery cutoff date of June 9, 2024.
 7 See Dkt. 8. Both parties anticipate disclosing their expert witness reports this early will
 8 necessitate supplemental disclosure of expert testimony that will cause both parties to incur
 9 unnecessary expense that can be avoided.

10 Second, Plaintiff's counsel will be out of the office March 27, 2024, through April 10,
 11 2024. A modest extension of the deadline for the disclosure of expert witness testimony will
 12 serve as a courtesy to Plaintiff's counsel and will not delay the trajectory of the case.

13 A brief extension of the expert disclosure deadlines would allow the parties more time
 14 and flexibility to adequately prepare their cases for trial in a manner that would collectively serve
 15 the Court and the parties. Under the instant stipulated proposal, all other deadlines from the
 16 Order Setting Trial and Related Deadlines would remain unchanged.

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25 ¹ "The Court will alter these dates only upon good cause shown." See Dkt. 8.

1 AGREED and STIPULATED this 29th day of February, 2024.

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21 STIPULATION AND ORDER - 3

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II. ORDER

The parties' stipulated motion (Dkt. No. 17) is GRANTED. The Court ORDERS that the current deadlines contained in the Order Setting Trial and Related Deadlines (Dkt. No. 8) be adjusted in the following manner:

| Event | New Deadline |
|---|--------------|
| Disclosure of expert testimony under FRCP 26(a)(2) | May 10, 2024 |
| Disclosure of rebuttal expert testimony under FRCP 26(a)(2) | May 31, 2024 |

All other deadlines from the Order Setting Trial and Related Deadlines (Dkt. No. 8) shall remain unchanged.

Dated this 1st day of March, 2024.

Kimberly K. Eason

Kymberly K. Evanson
United States District Judge

Presented by:

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